

FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

AUG 26 2002

KENNETH J. MURPHY, Clerk
CINCINNATI, OHIO

UNITED STATES OF AMERICA : CRIMINAL NO. CR-1-02-054

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:
:(HONORABLE SUSAN DLOTT)

vs. :
:
:
WALTER MEADE PUGH, JR. :
TYREESE DORRAN PUGH :
:

* * * * *

Government's Proposed Voir Dire QuestionsA. Investigation

You will hear testimony that this case was investigated by agents of the Federal Bureau of Investigation and local police officers. You will hear evidence that during the investigation a confidential informant was used and a telephone call made with the defendant, Walter Pugh, was recorded without his knowledge.

1. Law Enforcement.

Does anyone have any particular feelings (i.e., anger, ill will) about police officers in general?

- Any prior bad experience with
 - local police
 - FBI
 - Federal Government agencies (e.g., Veterans Admin., Soc. Sec. Admin)
- If so, would that experience make it difficult for you to be impartial to the government in this case?

2. Confidential Informant.

Does anyone feel it is wrong for the law enforcement to use confidential informants in its investigations?

- Do you understand that the use of confidential informants is a common and accepted way of investigating criminal activity?

3. Tape Recordings.

Does anyone believe it is wrong to secretly tape record a person's actions or conversations as a method of gathering evidence of criminal activity against them without the person's knowledge?

- If there is proof that the tape recording has not been altered or tampered with during or after it was made, would you consider it to be credible or believable evidence?

B. Guns

1. Counts 3, 4, & 5 charge the defendants with weapon offenses. The physical evidence in this case may include various firearms, including a 12-gauge shotgun.

- Will seeing the firearm cause anyone any apprehension or make you feel uneasy about sitting on this type of case?

2. Is anyone a member of the National Rifle Association (NRA)?

- if so, do you believe citizens (including felons) should be able to possess any type of gun regardless of its nature or regardless if it is illegal under federal law for them to possess?

3. Federal law says that it is illegal for a felon to possess a firearm.

- Does anyone think that this federal law should be changed, in any way and for any reason?

- Can you accept the fact that the gun laws are for Congress to change and should not be a consideration for you in deciding this case?

Respectfully submitted,

GREGORY G. LOCKHART
United States Attorney

Wende C. Cross

WENDE C. CROSS (0061531)
Assistant United States Attorney

CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing was mailed on this 26th day of August, 2002, to Edward J. Felson, 36 East Seventh Street, Suite 1650, Cincinnati, Ohio 45202; Walter M. Pugh, Jr., Pro Se, 900 Sycamore Street, Hamilton County Justice Center, Cincinnati, Ohio 45202; and J. Robert Andrews, 2662 Madison Road, Cincinnati, Ohio 45208.

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